

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

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| In re: |) | Case No. 18-21164-GLT |
| |) | Chapter 13 |
| JULIE KAY NORMAN-STARK AND |) | |
| SHERI LYNN STARK, |) | Docket No. |
| Debtors, |) | |
| RONDA J. WINNECOUR, TRUSTEE, |) | Related to Doc. No. 100 |
| |) | Hearing Date and Time: |
| Movant, |) | September 30, 2020 at 10:00 a.m. |
| v. |) | Responses due: September 23, |
| |) | 2020 |
| JULIE KAY NORMAN-STARK AND, |) | |
| SHERI LYNN STARK |) | |
| Respondent(s). |) | |

**RESPONSE TO PRECAUTIONARY OBJECTION OF CHAPTER 13 TRUSTEE TO
DEBTOR'S AMENDED EXEMPTIONS**

AND NOW, comes the debtors, Julie Kay Norman-Stark and Sheri Lynn Stark, by and through their attorneys, Max C Feldman, Esquire, Nicholas M. Feldman, Esquire, and Joseph A. Feldman, Esquire answers to movant's Precautionary Objection of Chapter 13 Trustee to Debtor's Amended Exemptions as follows:

1. Paragraph One of movant's precautionary objection is admitted.
2. Paragraph Two of movant's precautionary objection is admitted.
3. Paragraph Three of movant's precautionary objection is admitted.
4. Paragraph Four of movant's precautionary objection is admitted in part and denied in part. While it is admitted that the trustee has required information from the debtor some of which was provided at the time the trustee's precautionary objections was filed, the balance of the required information has since been provided as debtors have provided their individual credit reports to the trustee electronically on September 11, 2020.
5. Paragraph Five of the trustee's precautionary objection is an assertion of the trustee to

which no response is required.

WHEREFORE, the Debtors, Julie Kay Norman-Stark and Sheri Lynn Stark, respectfully request the court to allow the amended exemptions and deny trustee's precautionary objection of Chapter 13 Trustee to debtor's amended exemptions.

Respectfully submitted,

/s/ Max C. Feldman

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